

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KATHERINE CRAWFORD, et al.,	)	
	)	
Plaintiffs,	)	Civil No. 14-cv-4148
	)	
vs.	)	
	)	
KHALILAH ROBINSON, et al.	)	
	)	
Defendants.	)	

**ORDER**

On this \_\_\_\_ day of \_\_\_\_\_, 2015, it is hereby ORDERED that Plaintiffs' Motion for Extension of Time to Serve Amended Complaint and for Alternative Service of Amended Complaint is GRANTED.

It is FURTHER ORDERED THAT:

1. The Plaintiffs shall serve the Summons and Amended Complaint upon Defendants Khalilah Robinson, Tequina Simon, and Khalil Munir by \_\_\_\_\_, 2015.
2. The Plaintiffs may make such service upon Defendants Khalilah Robinson and Tequina Simon by United States Mail, First Class, postage pre-paid pursuant to the Order of the Philadelphia Court of Common Pleas on May 28, 2014.
3. The Plaintiffs may make such service upon Defendant Khalil Munir by United States Mail, First Class, postage pre-paid; by Certified Mail; and by posting on the Property at 1331 South 17th St, Philadelphia, PA 19146.

SO ORDERED:

\_\_\_\_\_  
Gerald J. Pappert, U.S.D.J.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>KATHERINE CRAWFORD, et al.,</b>	)	
<b>Plaintiffs,</b>	)	<b>Civil No. 14-cv-4148</b>
<b>vs.</b>	)	
<b>KHALILAH ROBINSON, et al.</b>	)	
<b>Defendants.</b>	)	

**PLAINTIFFS' MOTION  
FOR EXTENSION OF TIME TO SERVE AMENDED COMPLAINT AND  
FOR ALTERNATIVE SERVICE OF AMENDED COMPLAINT**

Plaintiffs Katherine Crawford, Rochelle Brown and Janice Crawford-Sharif, through counsel, request that this Court issue an Order (1) extending the time to serve the Summons and Amended Complaint (Doc. No. 26) through two weeks from the date of the Order; (2) reaffirming the continuing Order of the Philadelphia Court of Common Pleas dated May 28, 2014, that service may be made of the Summons and Amended Complaint on Defendants Khalilah Robinson and Tequina Simon by United States Mail, First Class, postage pre-paid; and (3) permitting service to be made on Defendant Khalil Munir by United States Mail, First Class, postage pre-paid, Certified Mail, and by posting on the Property at 1331 South 17th St, Philadelphia, PA 19146.

In support of this Motion, Plaintiffs aver:

1. Plaintiffs filed their original Complaint with the Philadelphia Court of Common Pleas on April 7, 2014. (Doc. No. 13.)
2. On May 28, 2014, the Court of Common Pleas issued an Order, that, *inter alia*, Plaintiffs may "[u]nless an appearance is entered for Defendants, effect service of any subsequent papers to be filed in this matter by ordinary United States Mail, postage prepaid, upon Defendants [Khalilah Robinson and Tequina Simon] at their last known address, 5722 W.

Oxford Street, Philadelphia, PA 19131; and 2112 Dorrance Street, Philadelphia, PA 19145.” (Doc. No. 13. *See* Exh. A.)

3. All Defendants were then properly served. (Doc. No. 13. *See esp.* Exhs. B, H, *and* I.)
4. Defendants Tequina Simon, Khalilah Robinson, and Khalil Munir never filed an Answer, entered an appearance, or otherwise responded to the original Complaint. (Doc. No. 13.)
5. After this matter was removed to this Court, Plaintiffs were provided leave to file an Amended Complaint. (Doc. No. 23.) Plaintiffs filed their Amended Complaint with this Court on April 6, 2015. (Doc. No. 26.)
6. Along with their Amended Complaint, Plaintiffs also filed a Motion for Leave to Proceed In Forma Pauperis on April 6, 2015 (Doc. No. 25.) This Court granted their Motion on April 14, 2015, and ordered the U.S. Marshals to make service upon all defendants who had not yet entered an appearance in this matter, including Tequina Simon, Khalilah Robinson, and Khalil Munir. (Doc. No. 28.)
7. Summons were issued to Defendants Khalilah Robinson, Tequina Simon, and Khalil Munir (collectively the “Three Defendants”), and forwarded to the U.S. Marshals on April 14, 2015. (Doc. No. 27.)
8. On June 29, 2015, the U.S. Marshals returned the Summons issued as to Khalil Munir as Unexecuted. (Doc. No. 39.) The U.S. Marshal’s Process Receipt and Return noted “1st Endeavor Asha Al Shabaz stated [Khalil Munir] does not live [at] address.” (Id.)
9. On August 13, 2015, the U.S. Marshals returned the Summons issued as to Khalilah Robinson as Unexecuted. (Doc. No. 51.) The U.S. Marshal’s Process Receipt and Return noted three unsuccessful weekday daytime attempts at personal service at her home. (Id.)

10. To date, the U.S. Marshals have not returned the Summons issued as to Tequina Simon.

Plaintiffs' counsel has contacted the U.S. Marshals' office, but is still awaiting a response.

11. To the best of Plaintiffs' counsel's personal knowledge, information, and belief, Tequina Simon resides at 5722 W. Oxford Street, Philadelphia, PA 19131; Khalilah Robinson resides at 2112 Dorrance Street, Philadelphia, PA 19145; and Khalil Munir resides at 336 E. Mt. Airy Ave., Philadelphia, PA 19119.

12. The home at 5722 W. Oxford Street, Philadelphia, PA 19131 is owned by Tequina Simon. (*See* Exh. G.) Tequina Simon was served the original Complaint on June 2, 2014, by U.S. Mail, Certified Mail, and on June 4, 2014 by posting on the Property pursuant to Court Order. (Doc. No. 13. *See* Exh. H.)

13. The home at 2112 Dorrance Street, Philadelphia, PA 19145 is owned by Khalilah Robinson. (*See* Exh. F.) Khalilah Robinson was served the original Complaint on June 2, 2014, by U.S. Mail, Certified Mail, and on June 4, 2014 by posting on the Property pursuant to Court Order. (Doc. No. 13. *See* Exh. I.)

14. Khalil Munir was personally served the original Complaint at his home on April 16, 2014. (Doc. No. 13. *See* Exh. B.)

15. The Three Defendants have never filed an Answer, entered any appearance, or responded to this lawsuit in any fashion.

16. On August 24, 2015, a volunteer attorney working with Plaintiffs' counsel unsuccessfully tried to make personal service of the Summons and Amended Complaint on the Three Defendants. (*See* Exh. D.)

17. The Three Defendants are siblings, whose addresses were provided to Plaintiffs' counsel

by several of their aunts and uncles. Their father, Defendant James Roscoe Smith, III, was successfully personally served the Amended Complaint by the U.S. Marshalls on July 24, 2015. (Doc. No. 50.)

18. Plaintiffs' counsel searched multiple online records databases, including voting, property ownership, dockets in other proceedings, and social media, but was unable to locate any other definitive home address for the Three Defendants.

Accordingly, Plaintiffs Katherine Crawford, Rochelle Brown, and Janice Crawford-Sharif, through counsel, request that this Court issue an Order (1) extending the time to serve the Summons and Amended Complaint (Doc. No. 26) through two weeks from the date of the Order; (2) reaffirming the continuing Order of the Philadelphia Court of Common Pleas dated May 28, 2014, that service may be made of the Summons and Amended Complaint on Defendants Khalilah Robinson and Tequina Simon by United States Mail, First Class, postage pre-paid; and (3) permitting service to be made on Defendant Khalil Munir by United States Mail, First Class, postage pre-paid, Certified Mail, and by posting on the Property at 1331 South 17th St, Philadelphia, PA 19146.

Respectfully submitted,

DATE: 8/31/15



Michael R. Froehlich, Esq.  
Attorney for Plaintiffs



Tequina Simon by United States Mail, First Class, postage pre-paid; and (3) permitting service to be made on Defendant Khalil Munir by United States Mail, First Class, postage pre-paid, Certified Mail, and by posting on the Property at 1331 South 17th St, Philadelphia, PA 19146.

## II. ARGUMENT

### A. Extension of Time to Serve Is Appropriate.

A plaintiff must serve each defendant within 120 days from filing of the complaint, or the court may dismiss the action if it does not allow an extension. Fed. R. Civ. P. 4(m). Before granting a motion to extend time for service of process, “the Court will first determine whether good cause exists for the Plaintiffs’ failure to timely serve. If good cause exists, the district court has no choice but to extend time for service. If good cause does not exist, the district court may consider whether to grant a discretionary extension of time” (citations omitted). McFadden v. Weiss, No. CIV.A. 13-2914, 2014 WL 5880097, at \*2 (E.D. Pa. Nov. 13, 2014).

Here, Plaintiffs’ counsel was still waiting for the U.S. Marshals to complete service on Defendants Khalilah Robinson, Tequina Simon, and Khalil Munir (collectively the “Three Defendants”), on August 4, 2015, when the 120 days ran from the filing of the Amended Complaint. As of August 4, 2015, the Marshals had returned only one Process Receipt and Return, which showed only a single unsuccessful “1st endeavor” to serve Khalil Munir. (Doc. No. 39.) Plaintiffs’ counsel mistook the absence of return of service as to Tequina Simon and the note of a “1st endeavor” (emphasis added) to serve Khalil Munir, to indicate ongoing attempts to serve the Three Defendants. In addition to employing the U.S. Marshals, however, Plaintiff sent another attorney to the record addresses of each of the Three Defendants to attempt service, but was unsuccessful.

It is within the discretion of this Court to grant an extension of time to serve this pleading. Plaintiffs' counsel requests this Court's discretionary extension of time.

While Plaintiff has not acted timely, Plaintiff has retained multiple companies to search for Defendant and has attempted at least one good faith effort to serve Defendant in each appropriate time period at a location wherein Plaintiff had reasonable belief that Defendant resided. Moreover, Defendant has failed to provide an address throughout this process. The Advisory Committee's notes on Federal Rule of Civil Procedure 4(m) suggest that courts may consider whether the defendant was evading service or concealing a defect in attempted service.

McFadden v. Weiss, No. CIV.A. 13-2914, 2014 WL 5880097, at \*2 (E.D. Pa. Nov. 13th, 2014), quoting Petrucelli v. Bohringer and Ratzinger, 46 F.3d 1298, 1305, 1305-06 (3d Cir.1995).

Here, Plaintiffs and their counsel have employed the U.S. Marshals and a private agent working on behalf of Plaintiffs' counsel.

The Three Defendants have not responded to service of original Complaint or otherwise expressed any interest in participating in this matter. The Three Defendants were served with the original Complaint, which was materially equivalent as to the claims against them. Plaintiffs' delay is not prejudicial to the Three Defendants or to any other party, and an extension of time to serve the Three Defendants is appropriate.

**B. Alternative Service Is Appropriate Now as Previously Ordered,  
as for Khalilah Robinson and Tequina Simon**

The Amended Complaint may be appropriately served as to both Tequina Simon and Khalilah Robinson "by ordinary United States Mail, postage prepaid, upon Defendants at their last known address, 5722 W. Oxford Street, Philadelphia, PA 19131; and 2112 Dorrance Street, Philadelphia, PA 19145 [respectively]" pursuant to the Order of the Honorable Nina Wright Padilla, Philadelphia Court of Common Pleas, dated May 28, 2014. (Doc. No. 13, Exh. A.)



When a matter is removed from state to Federal District Court, “all injunctions, orders, and other proceedings had in such action prior to its removal shall remain in full force and effect until dissolved or modified by the district court.” 28 U.S.C. § 1450.

Here, the Philadelphia Court of Common Pleas ordered that alternative service was permitted as to Khalilah Robinson and Tequina Simon “unless an appearance is entered for Defendants [for] any subsequent papers to be filed in this matter.” (Doc. No. 13, Exh. A.) That order remains in effect because this Court has not modified or dissolved that earlier order (nor has any party requested such reconsideration.) See Dougherty v. VFG, LLC, No. CIV.A. 14-2262, 2015 WL 4557248, at \*3 (E.D. Pa. July 28th, 2015) and Vigilante v. Statharos, No. 08-3408, 2009 WL 414014, at \*2 (E.D.Pa. Feb.16, 2009) (thirty days after removal, the window to move for reconsideration closes for an order preceding removal).

**C. Alternative Service is Appropriate for Khalil Munir**

Alternative service is now appropriate for Khalil Munir, because Plaintiffs have made good faith efforts to locate him, have made practical efforts to serve him, and now request alternative means calculated to supplement his existing notice of this action. In addition, Khalil Munir was personally served with the original Complaint but has not filed an Answer or otherwise expressed any interest in participating in this matter.

A plaintiff may serve a defendant “pursuant to the law of the state in which the district court is located.” Fed. R. Civ. P. 4(e). Service in Philadelphia County (as here) may be made by a competent adult who is not a party to the action. Pa. R. Civ. P. 400 & 400.1.

In Pennsylvania, a plaintiff may move for alternative service where service cannot be made under those appropriate rules. Pa. R. Civ. P. 430(a). “To succeed on this motion, Plaintiff

must show (1) a good faith effort to locate Defendant, (2) reasonable and practical efforts to serve Defendant, and (3) an alternate method reasonably calculated to provide the defendant with notice of the proceedings against him.” McFadden v. Weiss, No. CIV.A. 13-2914, 2014 WL 5880097, at \*2 (E.D. Pa. Nov. 13, 2014), quoting Calabro v. Leiner, 464 F.Supp.2d 470, 471 (2006).

A good faith effort to locate Defendant “might include, among other things, inquiries of postal authorities, inquiries of relatives, friends, neighbors, and employees of defendant, and examinations of voter registration records, local tax records, and motor vehicle records.” Calabro v. Leiner, 464 F. Supp. 2d 470, 472 (E.D. Pa. 2006), quoting Pa. R. Civ. P. 430(a), note (“It is not necessary that plaintiff pursue every method listed in the note to Rule 430(a) in order to satisfy the good faith effort requirement.”). Here, Plaintiffs successfully served the original complaint on Khalil Munir, personally, at his home address on April 16, 2014 (Doc. No. 13, Exh. B.) Plaintiffs requested the U.S. Marshalls’ assistance in effecting service at his home address. Plaintiffs have sent a private agent to attempt to serve Khalil Munir at his home address. They have asked Khalil Munir’s relatives and consulted online databases, but have not been able to locate any other definitive home address for him. This amounts to a “good faith effort” to locate Khalil Munir.

Plaintiffs’ efforts to serve Khalil Munir have been reasonable and practical, given the circumstances. Although the U.S. Marshals were told that Khalil Munir did not live at the address, he had earlier been served there by Plaintiffs’ investigator. (*See* Exh. B.) And when Plaintiffs’ counsel sent another attorney to attempt service, open first-floor windows suggested that someone was home but avoiding service. (*See* Exh. D.) Courts have sometimes held that more frequent attempts have been required to establish “reasonable and practical efforts”, *see*

e.g., Banegas v. Hampton, No. CIV.A. 08-5348, 2009 WL 1140268, at \*2 (E.D. Pa. Apr. 27, 2009) *and cases cited* (six attempts, or a stakeout were sufficient to show practical effort.) However, a court may find that fewer attempts are required where a defendant is found to be actively attempting to evade the process server. World Entm't Inc. v. Brown, 487 F. App'x 758, 761 (3d Cir. 2012) (leaving papers "in the defendant's physical proximity is usually sufficient if (1) defendant actively evades service, and (2) there is clear evidence that the defendant actually received the papers at issue when allegedly served.")

Here, Khalil Munir received the original Complaint when served personally at his home address on April 16, 2014. (Doc. No. 13. *See* Exh. B). He did not respond. After removal to this Court, the Amended Complaint simply names additional co-defendants. It does not amend the claims against Khalil Munir. Thus, Khalil Munir cannot deny practical notice of the matter. If Khalil Munir has since moved from that address, he has not reported his change of address to the Court or to Plaintiffs' counsel. Following the logic of World Entm't Inc. v. Brown, *supra*, Plaintiffs' practical efforts should be satisfactory to allow alternative service, given the instant circumstances.

Finally, Plaintiffs' proposed alternative method of mailing via First Class U.S. Mail, Certified Mail, and posting on the property at issue in this quiet title action is reasonably calculated to provide the defendant with notice of the proceedings against him. Any defense from Khalil Munir must be predicated on an interest in the Property. And if Khalil Munir would have an interest in the Property, then posting to that Property (along with mailing to his last known address) would supplement his present notice of the matter before this Court.


As such, alternative service is appropriate as for Khalil Munir.

### III. RELIEF REQUESTED

Plaintiffs Katherine Crawford, Rochelle Brown and Janice Crawford-Sharif, through counsel, request that this Court order (1) extending the time to serve the Summons and Amended Complaint (Doc. No. 26) through two weeks from the date of the Order; (2) reaffirming the continuing Order of the Philadelphia Court of Common Pleas dated May 28, 2014, that service may be made of the Summons and Amended Complaint on Defendants Khalilah Robinson and Tequina Simon by United States Mail, First Class, postage pre-paid; and (3) permitting service to be made on Defendant Khalil Munir by United States Mail, First Class, postage pre-paid, Certified Mail, and by posting on the Property at 1331 South 17th St, Philadelphia, PA 19146.

Respectfully submitted,

DATE: 8/31/15

  
\_\_\_\_\_  
Michael R. Froehlich, Esq.  
Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of Plaintiffs' Motion for Alternative Service of Complaint and Extension of Time to Serve Amended Complaint were sent to the following:

**VIA ECF:**

*Brett L. Messinger, Esq., Brian J. Slipakoff, Esq., and Dana Ostrovsky, Esq. on behalf of*  
U.S. Bank, National Association, as Trustee  
for the CMLTI Asset-Backed Pass-Through  
Certificates, Series 2007-AMC3  
425 Walnut St.  
Cincinnati, OH 45202

*Richard M. Bernstein, Esq. and Margaret L. Hutchinson, Esq., on behalf of*  
The Department of Housing and Urban  
Development

The Wanamaker Building  
100 Penn Square East  
Philadelphia, PA 19107-3380

*and*

The United States of America  
c/o United States Attorney for Eastern  
District of PA  
615 Chestnut St.  
Philadelphia, PA 19106

*Theodore Simon on behalf of*  
ALFRED BOWLES  
26 Inskip Court  
Cherry Hill, NJ 08003

*Michael Daley, Esq. on behalf of*  
COMMONWEALTH OF PA  
C/O First Judicial District  
Adult Probation Department  
1401 Arch Street  
Philadelphia, PA 19102

**VIA REGULAR MAIL:**

*Jada Greenhowe, Esq., on behalf of*  
Pennsylvania Housing Finance  
Administration (PHFA)  
211 North Front Street  
P.O. Box 15530  
Harrisburg, PA 17105-5530

KHALILAH ROBINSON  
2112 Dorrance Street  
Philadelphia, PA 19145

KHALIL MUNIR  
336 East Mt. Airy Avenue  
Philadelphia, PA 19119

TEQUINA SIMON  
5722 W. Oxford Street  
Philadelphia, PA 19131

JAMES ROSCOE SMITH, III  
2513 North 24<sup>th</sup> Street  
Philadelphia, PA 19132

ZACHARY CRAWFORD  
1331 South 17<sup>th</sup> Street  
Philadelphia, PA 19146

ALICE CRAWFORD  
1802 Morris St.  
Philadelphia, PA 19145

DATE: 8/ /2015

/s/ Michael R. Froehlich  
Michael R. Froehlich

# EXHIBIT A

**FILED**

23 MAY 2014 03:44 pm

**Civil Administration**

K. PERMSAP

**RECEIVED**

MAY 29 2014

**OFFICE OF JUDICIAL  
RECORDS**

KATHERINE CRAWFORD, JAMES  
CRAWFORD, ROCHELLE BROWN, and  
JANICE CRAWFORD-SHARIF,

Plaintiffs

COURT OF COMMON PLEAS

v.

PHILADELPHIA COUNTY

KHALILAH ROBINSON, KHALIL MUNIR,  
TEQUINA SIMON, JAMES ROSCOE  
SMITH, III, OCWEN Loan Servicing, LLC;  
U.S. Bank, National Association, as Trustee  
for the CMLTI Asset-Backed Pass-Through  
Certificates, Series 2007-AMC3,  
Pennsylvania Housing Finance Agency  
(PHFA), and The Department of Housing and  
Urban Development,

CIVIL DIVISION

APRIL TERM, 2014

NO. 00091

Defendants

**ORDER**

AND NOW, this 28<sup>th</sup> day of May, 2014, upon consideration of the Motion for  
Alternative Service of plaintiffs, and it appearing that after reasonable investigation the  
defendants cannot be personally served, it is hereby ORDERED AND DECREED that:

1. Effect service of the Complaint on Defendants Tequina Simon and Khalilah Robinson by  
posting on the property subject to this Quiet Title Action, 1331 South 17<sup>th</sup> Street,  
Philadelphia, Pennsylvania, AND by mailing to Defendants Tequina Simon and Khalilah  
Robinson by First Class U.S. Mail, postage prepaid to their last known addresses: 5722  
W. Oxford Street, Philadelphia, PA 19131; and 2112 Dorrance Street, Philadelphia, PA  
19145.

**DOCKETED**

MAY 29 2014

**WILLIAM DEANE  
JUDICIAL RECORDS**

Crawford Etal Vs Robins-ORDER

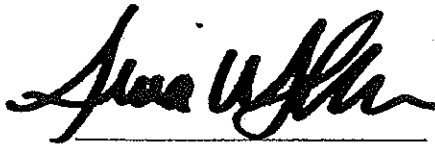


Case ID: 140400091

Control No.: 14053069

2. Unless an appearance is entered for Defendants, effect service of any subsequent papers to be filed in this matter by ordinary United States Mail, postage prepaid, upon Defendants at their last known address, 5722 W. Oxford Street, Philadelphia, PA 19131; and 2112 Dorrance Street, Philadelphia, PA 19145.

BY THE COURT:



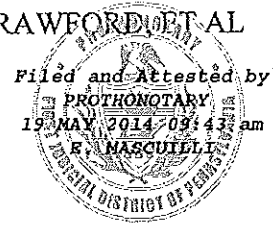
J.



# EXHIBIT B

By: Michael Froehlich, Esquire  
Mfroehlich@ClsPhila.org  
Attorney ID No.: 92767  
COMMUNITY LEGAL SERVICES, INC.  
1410 West Erie Avenue  
Philadelphia, Pennsylvania 19140  
Telephone No.: (215) 227-4377

Attorney For Plaintiffs  
KATHERINE CRAWFORD ET AL



KATHERINE CRAWFORD, James Crawford,  
ROCHELLE BROWN, JANICE CRAWFORD  
SHARIF,

Plaintiffs,

vs.

KHALILAH ROBINSON, KHALIL MUNIR,  
TEQUINA SIMON, JAMES ROSCOE SMITH, III,  
OCWEN Loan Servicing, LLC; U.S. Bank, National  
Association, as Trustee for the CMLTI Asset-Backed  
Pass-Through Certificates, Series 2007-AMC3,  
Pennsylvania Housing Finance Agency (PHFA),  
and The Department of Housing and Urban  
Development,

Defendants.

PHILADELPHIA COUNTY  
COURT OF COMMON PLEAS  
TRIAL DIVISION

APRIL TERM, 2014  
No.00091

### AFFIDAVIT OF SERVICE

Served and made known to KHALILAH MUNIR, Defendant on the 16<sup>th</sup> day of April, 2014, at 4:19 P.M., at 316 East Mt. Airy Avenue, Philadelphia, PA 19119, in the manner described below:

  X   Defendant personally served.

       Adult Family member with whom Defendant(s) reside(s).  
Relationship is \_\_\_\_\_.

       Adult in charge of Defendant's residence who refused to give name or relationship.

       Manager/Clerk of place of lodging in which Defendant(s) reside(s).

\_\_\_ Agent or person in charge of Defendant's office or usual place of business.

\_\_\_\_\_ an officer of Defendant's company.

\_\_\_ Other: \_\_\_\_\_.

Description: Age: 25 Height: 5' 5" Weight: 165 Race: Black Sex: Male Other: \_\_\_\_\_

I, Edgardo Reyes, a competent adult, hereby verify that I personally handed a true and correct copy of the Quiet Title Complaint in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above. I understand that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

Name: Edgardo J. Reyes

Printed Name: EDGARDO J. REYES

Title: INVESTIGATOR

# EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>KATHERINE CRAWFORD, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>Civil No. 14-cv-4148</b>
	)	
<b>vs.</b>	)	
	)	
<b>KHALILAH ROBINSON, et al.</b>	)	
	)	
<b>Defendants.</b>	)	

**AFFIDAVIT OF SERVICE**

I, David W. Jonas, declare that on Thursday, August 27, 2015 I caused to be mailed Summons and Amended Complaint on three defendants, Khalilah Robinson, Tequina Simon, and Khalil Munir, at 2112 Dorrance Street, 5722 West Oxford Street, and 336 East Mount Airy Avenue (their respective homes) in Philadelphia County, Pennsylvania.

This effects service as to Khalilah Robinson and Tequina Simon, pursuant to the court order, dated May 28, 2014, from the Honorable Nina Wright Padilla, Philadelphia Court of Common Pleas. (Doc. No. 1, and attached here as Exhibit A.) When a matter is removed from state to Federal District Court, "all injunctions, orders, and other proceedings had in such action prior to its removal shall remain in full force and effect until dissolved or modified by the district court." 28 U.S.C. § 1450.

Signed under penalties of perjury, this 28th day of August, 2015,



David W Jonas, Esquire

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* Khalilah Robinson  
 was received by me on *(date)* 08/21/2015.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or


☐ I returned the summons unexecuted because \_\_\_\_\_; or

☒ Other *(specify)*: I today sent the summons and Amended Complaint, addressed to Khalilah Robinson at  
 2112 Dorrance Street, Philadelphia PA 19145, by United States Mail postage paid as both  
 First Class and Certified Mail.

My fees are \$ 0.00 for travel and \$ 0.00 for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date:

08/27/2015


Server's signature

David W Jonas, Esq.

Printed name and title

c/o Community Legal Services  
 1410 West Erie Avenue  
 Philadelphia, PA 19140

Server's address

Additional information regarding attempted service, etc:

This service complies with the May 28, 2014 Order from the Honorable Nina Wright Padilla, Philadelphia Court of Common Pleas. (Doc. No. 1, and attached here as Exhibit A.) When a matter is removed from state to Federal District Court, "all injunctions, orders, and other proceedings had in such action prior to its removal shall remain in full force and effect until dissolved or modified by the district court." 28 U.S.C. § 1450.

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* Tequina Simon  
 was received by me on *(date)* 08/21/2015 .

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or


☐ I returned the summons unexecuted because \_\_\_\_\_ ; or

☒ Other *(specify)*: I today sent the summons and Amended Complaint, addressed to Tequina Simon at 5722  
 West Oxford Street, Philadelphia PA 19131, by United States Mail postage paid as both  
 First Class and Certified Mail.

My fees are \$ 0.00 for travel and \$ 0.00 for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: 08/27/2015

  
 \_\_\_\_\_  
*Server's signature*

David W Jonas, Esq.  
 \_\_\_\_\_  
*Printed name and title*

c/o Community Legal Services  
 1410 West Erie Avenue  
 Philadelphia, PA 19140  
 \_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

This service complies with the May 28, 2014 Order from the Honorable Nina Wright Padilla, Philadelphia Court of Common Pleas. (Doc. No. 1, and attached here as Exhibit A.) When a matter is removed from state to Federal District Court, "all injunctions, orders, and other proceedings had in such action prior to its removal shall remain in full force and effect until dissolved or modified by the district court." 28 U.S.C. § 1450.

# EXHIBIT D



AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:14-cv-04148-GJP

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* Khalilah Robinson  
 was received by me on *(date)* 08/21/2015.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☒ I returned the summons unexecuted because no answer at address; or

☐ Other *(specify)*:

My fees are \$ 5.00 for travel and \$ 0.00 for services, for a total of \$ 5.00.

I declare under penalty of perjury that this information is true.

Date:

08/27/2015


\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
 David W Jonas, Esq.

*Printed name and title*

\_\_\_\_\_  
 Community Legal Services  
 1410 West Erie Avenue  
 Philadelphia, PA 19140

*Server's address*

Additional information regarding attempted service, etc:

At 11:20am on Monday, August 24, 2015, I observed premises, 2112 Dorrance Street, Philadelphia PA 19145 for five minutes; I then knocked and rang doorbell three times each over the next five minutes. There was no response from inside. I then waited and observed premises for five more minutes from the street, but there was no sign of any resident.

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:14-cv-04148-GJP

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* Tequina Simon  
 was received by me on *(date)* 08/21/2015.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
 on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 on *(date)* \_\_\_\_\_; or

☒ I returned the summons unexecuted because no answer at address; or

☐ Other *(specify)*:

My fees are \$ 5.00 for travel and \$ 0.00 for services, for a total of \$ 5.00.

I declare under penalty of perjury that this information is true.

Date:

08/27/2015*Server's signature*David W Jonas, Esq.*Printed name and title*

Community Legal Services  
 1410 West Erie Avenue  
 Philadelphia, PA 19140

*Server's address*

Additional information regarding attempted service, etc:

At 12:10pm on Monday, August 24, 2015, I observed premises, 5722 West Oxford Street, Philadelphia PA 19131 for five minutes; I then knocked and rang doorbell three times each over the next five minutes. There was no response from inside. I then waited and observed premises for five more minutes from the street, but there was no sign of any resident.

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:14-cv-04148-GJP

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* Khalil Munir  
 was received by me on *(date)* 08/21/2015 .

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
 on *(date)* \_\_\_\_\_ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 on *(date)* \_\_\_\_\_ ; or


☒ I returned the summons unexecuted because no answer at address ; or

☐ Other *(specify)*:

My fees are \$ 5.00 for travel and \$ 0.00 for services, for a total of \$ 5.00 .

I declare under penalty of perjury that this information is true.

Date: 08/27/2015

  
 \_\_\_\_\_  
*Server's signature*

David W Jonas, Esq.  
 \_\_\_\_\_  
*Printed name and title*

Community Legal Services  
1410 West Erie Avenue  
Philadelphia, PA 19140  
 \_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

At 1:20pm on Monday, August 24, 2015, I observed premises, 336 East Mount Airy Avenue, Philadelphia PA 19119 for five minutes; I then knocked and rang doorbell three times each over the next five minutes. There was no response from inside, but the open windows suggested someone was home. I then waited and observed premises for five more minutes from the street, but there was no sign of any resident.

# EXHIBIT E

File No. NW-6044

Parcel ID No. 22-2-178400

**This Indenture**, made the 22<sup>nd</sup> day of January, 2013,

**Between**

**MICHELLE POLLINO**

(hereinafter called the Grantor), of the one part, and

**ASHA N. EL-SHABAZZ**

(hereinafter called the Grantee), of the other part,

**Witnesseth**, that the said Grantor for and in consideration of the sum of **One Hundred Seventy Thousand And 00/100 Dollars (\$170,000.00)** lawful money of the United States of America, unto her well and truly paid by the said Grantee, at or before the sealing and delivery hereof, the receipt whereof is hereby acknowledged, has granted, bargained and sold, released and confirmed, and by these presents does grant, bargain and sell, release and confirm unto the said Grantee Sole Owner, his/her personal representatives and assigns his heirs and assigns,

**PREMISES "A"**

ALL THAT CERTAIN strip or piece of ground situate in the 22<sup>nd</sup> Ward of the City of Philadelphia,

BEGINNING at a point at the distance of 140 feet Southeastwardly from the Southeasterly side of Mt. Airy Avenue measured on a line at right angles thereto said point being also at the distance of 85 feet more or less Southwestwardly from the Southwesterly side of Ardleigh Street, said point in Ardleigh Street being at a distance of 140 feet and  $\frac{1}{2}$  of an inch Southeastwardly from the Southeasterly side of Mt. Airy Avenue; THENCE extending Southwestwardly on a line parallel with Mt. Airy Avenue 27 feet and 6 inches to a point; THENCE Southeastwardly on a line at right angles to Mt. Airy Avenue 10 feet to a point; THENCE Northeastwardly on a line parallel with Mt. Airy Avenue 27 feet 6 inches to point; THENCE Northeastwardly on a line at right angles to Mt. Airy Avenue 10 feet to the point of beginning.

**PREMISES "B"**

ALL THAT CERTAIN Lot or piece of ground with the three story stone and brick messuage or tenement thereon erected, SITUATE on the Southeasterly side of Mt. Airy Avenue at the distance of 82 feet 3 and  $\frac{7}{8}$  inches Southwestwardly from the Southwesterly side of Ardleigh Street in the 22<sup>nd</sup> Ward of the City of Philadelphia.

CONTAINING in front or breadth on the said Mt. Airy Avenue 27 feet 6 inches and extending Southeastwardly of that width in length or depth between parallel lines at right angles to the said Mt. Airy Avenue 140 feet.

BEING known as 336 E. Mt. Airy Avenue

TOGETHER with the free and common use, right, liberty and privilege of a certain 10 feet wide driveway as and for a passageway at all times hereafter, forever as described in Deed recorded as aforesaid in Deed Book JMH 708 page 165.

eRecorded in Philadelphia PA Doc Id: 52599759  
02/19/2013 09:03AM Receipt#: 1208091  
Page 1 of 7 Rec Fee: \$230.00  
Commissioner of Records Doc Code: D  
State RTT: \$1,700.00 Local RTT: \$5,100.00

**BEING** the same premises which Michelle Pollino and Maggie Boccella, by deed dated June 5, 2008, and recorded July 11, 2008, in the Office of the Recorder of Deeds in and for the County of Philadelphia, Pennsylvania, as Instrument No. 51936183, granted and conveyed unto Michelle Pollino, in fee.



**Together with** all and singular the buildings and improvements, ways, streets, alleys, driveways, passages, waters, water-courses, rights, liberties, privileges, hereditaments and appurtenances, whatsoever unto the hereby granted premises belonging, or in anywise appertaining, and the reversions and remainders, rents, issues, and profits thereof; and all the estate, right, title, interest, property, claim and demand whatsoever of her, the said grantor, as well at law as in equity, of, in and to the same.

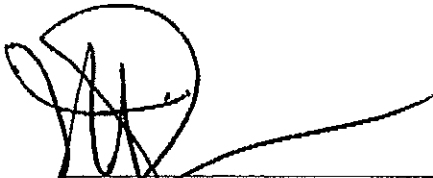
**To have and to hold** the said lot or piece of ground described above, with the buildings and improvements thereon erected, hereditaments and premises hereby granted, or mentioned and intended so to be, with the appurtenances, unto the said Grantees, their heirs and assigns, to and for the only proper use and behoof of the said Grantees, their heirs and assigns, forever.

**And** the said Grantor, for herself and her heirs, executors and administrators, does, by these presents, covenant, grant and agree, to and with the said Grantees, their heirs and assigns, that she, the said Grantor, and her heirs, all and singular the hereditaments and premises herein described and granted, or mentioned and intended so to be, with the appurtenances, unto the said Grantees, their heirs and assigns, against her, the said Grantor, and her heirs, and against all and every other person and persons whosoever lawfully claiming or to claim the same or any part thereof, by, from or under him, her, it, or any of them, shall and will

**Warrant and Foreber Defend.**

**In Witness Whereof**, the party of the first part has hereunto set her hand and seal. Dated the day and year first above written.

**Sealed and Delivered**  
IN THE PRESENCE OF US:

  
\_\_\_\_\_  
Michelle Pollino

{SEAL}

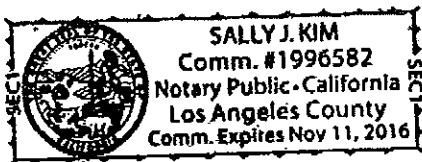
SEE ATTACHED  
NOTARIAL CERTIFICATE

# CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California )  
County of Los Angeles )

On **January 22, 2013**, before me, Sally J. Kim, Notary Public, personally appeared **MICHELLE POLLINO**, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.



WITNESS my hand and official seal.

*[Signature]*  
Sally J. Kim, Notary Public

===== OPTIONAL SECTION =====

Though the data below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent reattachment of this form.

## CAPACITY CLAIMED BY SIGNER

- ☐ INDIVIDUAL  
☐ CORPORATE OFFICER(S)

TITLE(S)

- ☐ PARTNER(S) ☐ LIMITED  
☐ GENERAL  
☐ ATTORNEY-IN-FACT  
☐ TRUSTEE(S)  
☐ GUARDIAN/CONSERVATOR  
☐ OTHER: \_\_\_\_\_

## DESCRIPTION OF ATTACHED DOCUMENT

### INDENTURE

TITLE OR TYPE OF DOCUMENT

*3*

NUMBER OF PAGES

*Jan 22 2013*

DATE OF DOCUMENT

## SIGNER IS REPRESENTING:

NAME OF PERSON(S) OR ENTITY(IES)

*None*

SIGNER(S) OTHER THAN NAMED ABOVE



State of California  
County of Los Angeles

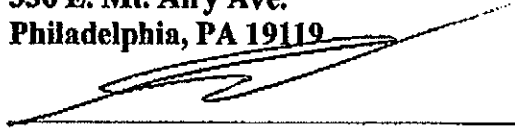
~~Commonwealth of Pennsylvania~~ :  
~~County of \_\_\_\_\_~~ : ss

On this the 22 day of January, 2013, before me, a Notary Public for the Commonwealth of Pennsylvania, residing in the County of \_\_\_\_\_, the undersigned Officer, personally appeared **Michelle Pollino**, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that she executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
My commission expires \_\_\_\_\_

The address of the above-named Grantees is:  
**336 E. Mt. Airy Ave.  
Philadelphia, PA 19119**

  
\_\_\_\_\_  
On behalf of the Grantees

File No. NW-6044

Record and return to:  
**Northwest Abstract Company, Inc.  
801 Bethlehem Pike  
Erdenheim, PA 19038**

<b>PHILADELPHIA REAL ESTATE TRANSFER TAX CERTIFICATION</b>		BOOK NO.      PAGE NO.	
		DATE RECORDED	
		CITY TAX PAID	
Complete each section and file in duplicate with Recorder of Deeds when (1) the full consideration/valua is/is not set forth in the deed, (2) when the deed is with consideration, or by gift, or (3) a tax exemption is claimed. If more space is needed, attach additional sheet(s).			
<b>A. CORRESPONDENT — All inquiries may be directed to the following person:</b>			
NAME <b>Northwest Abstract Company, Inc.</b>		TELEPHONE NUMBER: <b>Tel:215-233-</b> AREA CODE (    ) <b>0888</b> Fax: <b>215-836-7113</b>	
STREET ADDRESS <b>801 Bethlehem Pike</b>		CITY <b>Erdenheim</b>	STATE <b>PA</b>
		ZIP CODE <b>19038</b>	
<b>B. TRANSFER DATA</b>		DATE OF ACCEPTANCE OF DOCUMENT: <b>January 25, 2013</b>	
GRANTOR(S)/LESSOR(S) <b>Michelle Pollino</b>		GRANTEE(S)/LESSEE(S) <b>Asha N. El-Shabazz</b>	
STREET ADDRESS <b>1433 Del Monte Dr.</b>		STREET ADDRESS <b>336 E. Mt. Airy Ave.</b>	
CITY <b>Glendale</b>	STATE <b>CA</b>	ZIP CODE <b>91207</b>	CITY <b>Philadelphia</b>
		STATE <b>PA</b>	ZIP CODE <b>19119</b>
<b>C. PROPERTY LOCATION</b>			
STREET ADDRESS <b>336 E. Mt. Airy Ave.</b>		CITY, TOWNSHIP, BOROUGH	
COUNTY <b>Philadelphia</b>	SCHOOL DISTRICT	TAX PARCEL NUMBER <b>22-2-178400</b>	
<b>D. VALUATION DATA</b>			
1. ACTUAL CASH CONSIDERATION <b>170,000.00</b>		2. OTHER CONSIDERATION +	
		3. TOTAL CONSIDERATION = <b>170,000.00</b>	
4. COUNTY ASSESSED VALUE <b>28,960.00</b>		5. COMMON LEVEL RATIO FACTOR X <b>3.97</b>	
		6. FAIR MARKET VALUE = <b>114,971.20</b>	
<b>E. EXEMPTION DATA</b>			
1A. AMOUNT OF EXEMPTION <b>0</b>		1B. PERCENTAGE OF INTEREST CONVEYED <b>100</b>	
<b>2. Check Appropriate Box Below for Exemption Claimed</b>			
<input type="checkbox"/> Will or Intestate succession _____ <div style="text-align: center; font-size: small;">(NAME OF DECEDENT)      (ESTATE FILE NUMBER)</div>			
<input type="checkbox"/> Transfer to Industrial Development Agency.			
<input type="checkbox"/> Transfer to agent or straw party. (Attach copy of agency/straw party agreement).			
<input type="checkbox"/> Transfer between principal and agent. (Attach copy of agency/straw trust agreement). Tax paid prior deed \$ _____.			
<input type="checkbox"/> Transfers to the Commonwealth, the United States, and Instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (Attach copy of resolution).			
<input type="checkbox"/> Transfer from mortgagor to a holder of a mortgage in default. Mortgage Book Number _____, Page Number _____. Mortgagee (grantor) sold property to Mortgagor (grantee) (Attach copy of prior deed).			
<input type="checkbox"/> Corrective deed (Attach copy of the prior deed).			
<input type="checkbox"/> Other (Please explain exemption claimed, if other than listed above.) _____ _____ _____			
<i>Under penalties of law or ordinance, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.</i>			
SIGNATURE OF CORRESPONDENT OR RESPONSIBLE PARTY <b>Northwest Abstract Company, Inc., By:</b> _____			DATE <b>January 25, 2013</b>

<b>PHILADELPHIA REAL ESTATE TRANSFER TAX CERTIFICATION</b>		BOOK NO. _____ PAGE NO. _____
		DATE RECORDED _____ CITY TAX PAID _____
Complete each section and file in duplicate with Recorder of Deeds when (1) the full consideration/value is/is not set forth in the deed, (2) when the deed is with consideration, or by gift, or (3) a tax exemption is claimed. If more space is needed, attach additional sheet(s).		
<b>A. CORRESPONDENT — All inquiries may be directed to the following person:</b>		
NAME <b>Northwest Abstract Company, Inc.</b>		TELEPHONE NUMBER: <b>Tel: 215-233-</b> AREA CODE ( ) <b>0888</b> Fax: <b>215-836-7113</b>
STREET ADDRESS <b>801 Bethlehem Pike</b>	CITY <b>Erdenheim</b>	STATE <b>PA</b>
		ZIP CODE <b>19038</b>
<b>B. TRANSFER DATA</b>		DATE OF ACCEPTANCE OF DOCUMENT: <b>January 25, 2013</b>
GRANTOR(S)/LESSOR(S) <b>Michelle Pollino</b>		GRANTEE(S)/LESSEE(S) <b>Asha N. El-Shabazz</b>
STREET ADDRESS <b>1433 Del Monte Dr.</b>		STREET ADDRESS <b>336 E. Mt. Airy Ave.</b>
CITY <b>Glendale</b>	STATE <b>CA</b>	ZIP CODE <b>91207</b>
		CITY <b>Philadelphia</b>
		STATE <b>PA</b>
		ZIP CODE <b>19119</b>
<b>C. PROPERTY LOCATION</b>		
STREET ADDRESS <b>336 E. Mt. Airy Ave.</b>		CITY, TOWNSHIP, BOROUGH _____
COUNTY <b>Philadelphia</b>	SCHOOL DISTRICT _____	TAX PARCEL NUMBER <b>22-2-178400</b>
<b>D. VALUATION DATA</b>		
1. ACTUAL CASH CONSIDERATION <b>170,000.00</b>	2. OTHER CONSIDERATION <b>+</b>	3. TOTAL CONSIDERATION <b>= 170,000.00</b>
4. COUNTY ASSESSED VALUE <b>28,960.00</b>	5. COMMON LEVEL RATIO FACTOR <b>X 3.97</b>	6. FAIR MARKET VALUE <b>= 114,971.20</b>
<b>E. EXEMPTION DATA</b>		
1A. AMOUNT OF EXEMPTION <b>0</b>	1B. PERCENTAGE OF INTEREST CONVEYED <b>100</b>	
2. Check Appropriate Box Below for Exemption Claimed		
<input type="checkbox"/> Will or intestate succession _____ <div style="text-align: center; font-size: small;">(NAME OF DECEDENT) (ESTATE FILE NUMBER)</div>		
<input type="checkbox"/> Transfer to Industrial Development Agency.		
<input type="checkbox"/> Transfer to agent or straw party. (Attach copy of agency/straw party agreement).		
<input type="checkbox"/> Transfer between principal and agent. (Attach copy of agency/straw trust agreement). Tax paid prior deed \$ _____.		
<input type="checkbox"/> Transfers to the Commonwealth, the United States, and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (Attach copy of resolution).		
<input type="checkbox"/> Transfer from mortgagor to a holder of a mortgage in default. Mortgage Book Number _____, Page Number _____ Mortgagee (grantor) sold property to Mortgagor (grantee) (Attach copy of prior deed).		
<input type="checkbox"/> Corrective deed (Attach copy of the prior deed).		
<input type="checkbox"/> Other (Please explain exemption claimed, if other than listed above.) _____ _____ _____		
Under penalties of law or ordinance, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.		
SIGNATURE OF CORRESPONDENT OR RESPONSIBLE PARTY <b>Northwest Abstract Company, Inc., By: _____</b>		DATE <b>January 25, 2013</b>

# EXHIBIT F



We're making this site better. Preview the new version and tell us what you think.  
(<http://alpha.phila.gov/property>)

# 2112 DORRANCE ST ACCOUNT # 481273400

**Assessment****Tax LOOP**

## Account Information

**OWNER(S)**

ROBINSON KHALILAH

**MAILING ADDRESS**

2112 DORRANCE ST  
Philadelphia PA  
19145-0000

**PROPERTY UNIT**

None

**PROPERTY ZIP**

19145-0000

**SALE DATE**

7/17/2013

**SALE PRICE**

\$1

**HOMESTEAD**

Yes\*

## Property Characteristics

**LAND AREA**

665.52 SqFt

**IMPROVEMENT AREA**

1,048 SqFt

**IMPROVEMENT DESCRIPTION**

ROW 2 STY MASONRY

BEGINNING POINT

86'10" S SNYDER AVE

EXTERIOR CONDITION

Average

ZONING

RM1 Residential/Residential Mixed-Use

**Certified Valuation History**

YEAR	MARKET VALUE	ASSESSED LAND (TAXABLE)	ASSESSED IMPROVEMENT (TAXABLE)	ASSESSED LAND (EXEMPT)	ASSESSED IMPROVEMENT (EXEMPT)	TOTAL ASSESSMENT
2016	\$79,600	\$7,920	\$41,680	\$0	\$30,000	\$79,600
2015	\$79,600	\$7,920	\$71,680	\$0	\$0	\$79,600
2014	\$79,600	\$7,920	\$71,680	\$0	\$0	\$79,600
2013	\$23,300	\$843	\$6,613	\$0	\$0	\$7,456
2012	\$23,300	\$843	\$6,613	\$0	\$0	\$7,456
2011	\$23,300	\$843	\$6,613	\$0	\$0	\$7,456
2010	\$23,300	\$843	\$6,613	\$0	\$0	\$7,456

Note: The Department of Revenue is responsible for collecting real estate taxes. Please visit the Department of Revenue Website (<http://www.phila.gov/revenue>) for information regarding the billing, collecting and accounting of real estate taxes or call 215-686-6442.

\* If approved for the Homestead Exemption, the amount is indicated in the 'Exempt' column. If you have an abatement or are enrolled in the Longtime Owner Occupants Program (LOOP), then you are ineligible to also have the Homestead Exemption.

[New Search](#)

[View Tax Balances \(http://www.phila.gov/revenue/RealEstateTax/Default.aspx?txtBRTNo=481273400\)](http://www.phila.gov/revenue/RealEstateTax/Default.aspx?txtBRTNo=481273400)

[Submit an Inquiry \(http://opa.phila.gov/opa.apps/Help/CitizenMain.aspx?sch=Ctrl2&s=1&url=search&id=2896002112\)](http://opa.phila.gov/opa.apps/Help/CitizenMain.aspx?sch=Ctrl2&s=1&url=search&id=2896002112)

# EXHIBIT G



We're making this site better. Preview the new version and tell us what you think.  
(<http://alpha.phila.gov/property>)

# 5722 W OXFORD ST ACCOUNT # 043264000

Assessment

Tax LOOP

## Account Information

### OWNER(S)

SIMON TEQUINA D

### MAILING ADDRESS

5722 W OXFORD ST  
Philadelphia PA  
19131-3431

### PROPERTY UNIT

None

### PROPERTY ZIP

19131-3431

### SALE DATE

2/20/2004

### SALE PRICE

\$84,900

### HOMESTEAD

No\*

## Property Characteristics

### LAND AREA

1,422.06 SqFt

### IMPROVEMENT AREA

1,399 SqFt

### IMPROVEMENT DESCRIPTION



ROW B/GAR 2STY MASONRY

BEGINNING POINT

169'2 3/4" W 57TH ST

EXTERIOR CONDITION

Average

ZONING

RM1 Residential/Residential Mixed-Use

**Certified Valuation History**

YEAR	MARKET VALUE	ASSESSED LAND (TAXABLE)	ASSESSED IMPROVEMENT (TAXABLE)	ASSESSED LAND (EXEMPT)	ASSESSED IMPROVEMENT (EXEMPT)	TOTAL ASSESSMENT
2016	\$84,700	\$8,248	\$76,452	\$0	\$0	\$84,700
2015	\$93,200	\$8,248	\$84,952	\$0	\$0	\$93,200
2014	\$93,200	\$8,248	\$84,952	\$0	\$0	\$93,200
2013	\$34,800	\$2,007	\$9,129	\$0	\$0	\$11,136
2012	\$34,800	\$2,007	\$9,129	\$0	\$0	\$11,136
2011	\$34,800	\$2,007	\$9,129	\$0	\$0	\$11,136
2010	\$34,800	\$2,007	\$9,129	\$0	\$0	\$11,136

Note: The Department of Revenue is responsible for collecting real estate taxes. Please visit the Department of Revenue Website (<http://www.phila.gov/revenue>) for information regarding the billing, collecting and accounting of real estate taxes or call 215-686-6442.

\* If approved for the Homestead Exemption, the amount is indicated in the 'Exempt' column. If you have an abatement or are enrolled in the Longtime Owner Occupants Program (LOOP), then you are ineligible to also have the Homestead Exemption.

**New Search**

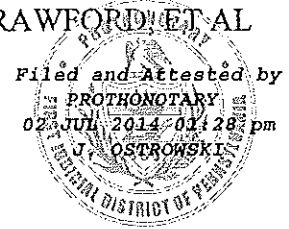
View Tax Balances (<http://www.phila.gov/revenue/RealEstateTax/Default.aspx?txtBRTNo=043264000>)

Submit an Inquiry (<http://opa.phila.gov/opa.apps/Help/CitizenMain.aspx?sch=Ctrl2&s=1&url=search&id=6212005722>)

# EXHIBIT H

By: Michael Froehlich, Esquire  
Mfroehlich@ClsPhila.org  
Attorney ID No.: 92767  
COMMUNITY LEGAL SERVICES, INC.  
1410 West Erie Avenue  
Philadelphia, Pennsylvania 19140  
Telephone No.: (215) 227-4377

Attorney For Plaintiffs  
KATHERINE CRAWFORD, ET AL



KATHERINE CRAWFORD, James Crawford,  
ROCHELLE BROWN, JANICE CRAWFORD  
SHARIF,

Plaintiffs,

vs.

KHALILAH ROBINSON, KHALIL MUNIR,  
TEQUINA SIMON, JAMES ROSCOE SMITH, III,  
OCWEN Loan Servicing, LLC; U.S. Bank, National  
Association, as Trustee for the CMLTI Asset-Backed  
Pass-Through Certificates, Series 2007-AMC3,  
Pennsylvania Housing Finance Agency (PHFA),  
and The Department of Housing and Urban  
Development,

Defendants.

PHILADELPHIA COUNTY  
COURT OF COMMON PLEAS  
TRIAL DIVISION

APRIL TERM, 2014  
No.00091

### AFFIDAVIT OF SERVICE

Served and made known to TEQUINA SIMON, Defendant, on the 2<sup>nd</sup> day of June, 2014, at 5722 W. Oxford Street, Philadelphia, PA 19131, in the manner described below:

\_\_\_ Defendant personally served.

\_\_\_ Adult Family member with whom Defendant(s) reside(s).  
Relationship is \_\_\_\_\_.

\_\_\_ Adult in charge of Defendant's residence who refused to give name or relationship.

\_\_\_ Manager/Clerk of place of lodging in which Defendant(s) reside(s).

\_\_\_\_ Agent or person in charge of Defendant's office or usual place of business.

\_\_\_\_\_ an officer of Defendant's company.

X Other: Mailed a copy of the Complaint, by regular and certified mail, to Defendant's property located at 5722 W. Oxford Street, Philadelphia, PA 19131 on 06/02/2014. The certified mail was returned as "Unclaimed". The regular mail was not returned.

Description: Age:\_\_\_\_ Height:\_\_\_\_ Weight:\_\_\_\_ Race:\_\_\_\_ Sex:\_\_\_\_ Other:\_\_\_\_\_

I, Henry A. Jefferson, a competent adult, hereby verify that I mailed a true and correct copy of the Quiet Title Complaint in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above. I understand that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

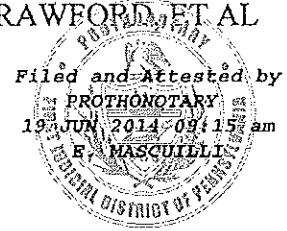
Name: Henry A. Jeff

Printed Name: Henry A. Jefferson

Title: Paralegal

By: Michael Froehlich, Esquire  
Mfroehlich@ClsPhila.org  
Attorney ID No.: 92767  
COMMUNITY LEGAL SERVICES, INC.  
1410 West Erie Avenue  
Philadelphia, Pennsylvania 19140  
Telephone No.: (215) 227-4377

Attorney For Plaintiffs  
KATHERINE CRAWFORD ET AL



KATHERINE CRAWFORD, James Crawford,  
ROCHELLE BROWN, JANICE CRAWFORD  
SHARIF,

Plaintiffs,

vs.

KHALILAH ROBINSON, KHALIL MUNIR,  
TEQUINA SIMON, JAMES ROSCOE SMITH, III,  
OCWEN Loan Servicing, LLC; U.S. Bank, National  
Association, as Trustee for the CMLTI Asset-Backed  
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Development,

Defendants.

PHILADELPHIA COUNTY  
COURT OF COMMON PLEAS  
TRIAL DIVISION

APRIL TERM, 2014  
No.00091

### AFFIDAVIT OF SERVICE

Served and made known to TEQUINA SIMON, Defendant on the 4<sup>th</sup> day of June, 2014, at 10:20 A.M., at 1331 South 17<sup>th</sup> Street, Philadelphia, PA 19146, in the manner described below:

\_\_\_ Defendant personally served.

\_\_\_ Adult Family member with whom Defendant(s) reside(s).  
Relationship is \_\_\_\_\_.

\_\_\_ Adult in charge of Defendant's residence who refused to give name or relationship.

\_\_\_ Manager/Clerk of place of lodging in which Defendant(s) reside(s).

\_\_\_\_ Agent or person in charge of Defendant's office or usual place of business.

\_\_\_\_\_ an officer of Defendant's company.

X Other: Posted a copy of the Complaint, per Court Order, on the property located at 1331 South 17<sup>th</sup> Street, Philadelphia, PA 19146 on 06/04/2014 at 10:20 A.M.

Description: Age:\_\_\_\_ Height:\_\_\_\_ Weight:\_\_\_\_ Race:\_\_\_\_ Sex:\_\_\_\_ Other:\_\_\_\_\_

I, Edgardo Reyes, a competent adult, hereby verify that I posted a true and correct copy of the Quiet Title Complaint in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above. I understand that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

Name: Edgardo J. Reyes

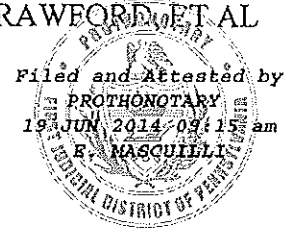
Printed Name: EDGARDO J. REYES

Title: INVESTIGATOR

# EXHIBIT I

By: Michael Froehlich, Esquire  
Mfroehlich@ClsPhila.org  
Attorney ID No.: 92767  
COMMUNITY LEGAL SERVICES, INC.  
1410 West Erie Avenue  
Philadelphia, Pennsylvania 19140  
Telephone No.: (215) 227-4377

Attorney For Plaintiffs  
KATHERINE CRAWFORD, ET AL



KATHERINE CRAWFORD, James Crawford,  
ROCHELLE BROWN, JANICE CRAWFORD  
SHARIF,

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KHALILAH ROBINSON, KHALIL MUNIR,  
TEQUINA SIMON, JAMES ROSCOE SMITH, III,  
OCWEN Loan Servicing, LLC; U.S. Bank, National  
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PHILADELPHIA COUNTY  
COURT OF COMMON PLEAS  
TRIAL DIVISION

APRIL TERM, 2014  
No.00091

### AFFIDAVIT OF SERVICE

Served and made known to KHALILAH ROBINSON, Defendant on the 4th day of June, 2014, at 10:20 A.M., at 1331 South 17<sup>th</sup> Street, Philadelphia, PA 19146, in the manner described below:

\_\_\_ Defendant personally served.

\_\_\_ Adult Family member with whom Defendant(s) reside(s).  
Relationship is \_\_\_\_\_.

\_\_\_ Adult in charge of Defendant's residence who refused to give name or relationship.

\_\_\_ Manager/Clerk of place of lodging in which Defendant(s) reside(s).



\_\_\_ Agent or person in charge of Defendant's office or usual place of business.

\_\_\_\_\_ an officer of Defendant's company.

X Other: Posted a copy of the Complaint, per Court Order, on the property located at 1331 South 17<sup>th</sup> Street, Philadelphia, PA 19146 on 06/04/2014 at 10:20 A.M.

Description: Age:\_\_\_ Height:\_\_\_ Weight:\_\_\_ Race:\_\_\_ Sex:\_\_\_ Other:\_\_\_

I, Edgardo Reyes, a competent adult, hereby verify that I posted a true and correct copy of the Quiet Title Complaint in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above. I understand that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

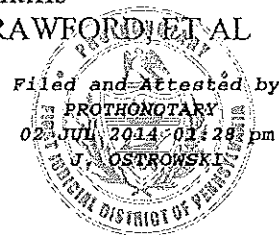
Name: Edgardo J. Reyes

Printed Name: EDGARDO J. REYES

Title: INVESTIGATOR

By: Michael Froehlich, Esquire  
Mfroehlich@ClsPhila.org  
Attorney ID No.: 92767  
COMMUNITY LEGAL SERVICES, INC.  
1410 West Erie Avenue  
Philadelphia, Pennsylvania 19140  
Telephone No.: (215) 227-4377

Attorney For Plaintiffs  
KATHERINE CRAWFORD ET AL



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PHILADELPHIA COUNTY  
COURT OF COMMON PLEAS  
TRIAL DIVISION

APRIL TERM, 2014  
No.00091

### AFFIDAVIT OF SERVICE

Served and made known to KHALILAH ROBINSON, Defendant, on the 2<sup>nd</sup> day of June, 2014,  
at 2112 Dorrance Street, Philadelphia, PA 19145, in the manner described below:

\_\_\_ Defendant personally served.

\_\_\_ Adult Family member with whom Defendant(s) reside(s).  
Relationship is \_\_\_\_\_.

\_\_\_ Adult in charge of Defendant's residence who refused to give name or relationship.

\_\_\_ Manager/Clerk of place of lodging in which Defendant(s) reside(s).

\_\_\_ Agent or person in charge of Defendant's office or usual place of business.

\_\_\_\_\_ an officer of Defendant's company.

X Other: Mailed a copy of the Complaint, by regular and certified mail, to Defendant's property located at 2112 Dorrance Street, Philadelphia, PA 19144 on 06/02/2014. The certified mail was returned as "Unclaimed". The regular mail was not returned.

Description: Age:\_\_\_ Height:\_\_\_ Weight:\_\_\_ Race:\_\_\_ Sex:\_\_\_ Other:\_\_\_\_\_

I, Henry A. Jefferson, a competent adult, hereby verify that I mailed a true and correct copy of the Quiet Title Complaint in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above. I understand that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

Name: Henry A. Jefferson

Printed Name: Henry A. Jefferson

Title: Paralegal